

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STEPHEN SULLIVAN, WHITE OAK FUND LP,
CALIFORNIA STATE TEACHERS' RETIREMENT
SYSTEM, SONTERRA CAPITAL MASTER FUND,
LTD., FRONTPOINT PARTNERS TRADING
FUND, L.P., AND FRONTPOINT AUSTRALIAN
OPPORTUNITIES TRUST on behalf of themselves
and all others similarly situated,

Plaintiffs,

- against -

BARCLAYS PLC, BARCLAYS BANK PLC, BARCLAYS
CAPITAL INC., BNP PARIBAS S.A., CITIGROUP,
INC., CITIBANK, N.A., COÖPERATIEVE
CENTRALE RAIFFEISEN-BOERENLEENBANK
B.A., CRÉDIT AGRICOLE S.A., CRÉDIT AGRICOLE
CIB, DEUTSCHE BANK AG, DB GROUP SERVICES
UK LIMITED, HSBC HOLDINGS PLC, HSBC BANK
PLC, ICAP PLC, ICAP EUROPE LIMITED, J.P.
MORGAN CHASE & CO., JPMORGAN CHASE
BANK, N.A., THE ROYAL BANK OF SCOTLAND
PLC, SOCIÉTÉ GÉNÉRALE SA, UBS AG AND JOHN
DOE NOS. 1-50,

Defendants.

Docket No. 13-cv-02811 (PKC)

**NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION
SETTLEMENT WITH DEFENDANTS CITIBANK, N.A., CITIGROUP INC.,
JPMORGAN CHASE & CO., AND JPMORGAN CHASE BANK, N.A., AND OF THE
PROPOSED FORM AND PROGRAM OF NOTICE TO THE SETTLEMENT CLASS**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declarations of Vincent Briganti and Christopher Lovell, the Affidavit of Linda V. Young, the exhibits attached thereto, and the record herein, Plaintiffs, by and through their undersigned counsel, will respectfully move this Court, before the Honorable P. Kevin Castel, United States District Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York on a date to be set by the Court, for an order:

- (a) preliminarily approving Plaintiffs' proposed Settlement, subject to later, final approval;
- (b) conditionally certifying a Settlement Class as to the claims against Citi and JPMorgan solely for purposes of effectuating the Settlement;
- (c) appointing Lowey Dannenberg, P.C. and Lovell Stewart Halebian Jacobson LLP as Class Counsel for the Settlement;
- (d) appointing Amalgamated Bank as Escrow Agent for purposes of the Settlement Fund;
- (e) appointing A.B. Data, Ltd. as the Settlement Administrator for the Settlement;
- (f) approving Plaintiffs' proposed forms of Notice to the Settlement Class of the Settlement with Citi and JPMorgan and the proposed Notice plan;
- (g) approving Plaintiffs' previously-approved Distribution Plan to the Settlement; and
- (h) setting a schedule leading to the Court's consideration of final approval of the Settlement, including: (i) the date, time, and place for a hearing to consider the fairness, reasonableness, and adequacy of the Settlement; (ii) the deadline for members of the Settlement Class to exclude themselves (*i.e.*, opt out) from the Settlement; (iii) the deadline for Class Counsel to submit a petition for attorneys' fees and reimbursement of expenses, and incentive awards for Settlement Class representatives; and (iv) the deadline for Settlement Class Members to object to the Settlement and any of the related petitions.

Dated: November 21, 2018
White Plains, New York

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